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3		
4	Telephone: 702.862.8800 Fax No.: 702.862.8811	
5	Attorney for Defendant	
6	HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY	
7		
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10		
11	VIRGINIA ROLLINS,	Case No. 2:22-cv-00969-JCM-NJK
12	Plaintiff,	STIPULATION AND (PROPOSED) ORDER TO EXTEND TIME FOR
13	V.	DEFENDANT TO FILE RESPONSE TO COMPLAINT
14	HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY,	
15	Defendant.	[FIRST REQUEST]
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19	Plaintiff Virginia Rollins and Defendant Hartford Life and Accident Insurance Company, by	
20	and through their attorneys of record, stipulate to extend the time for Defendant to file a response to	
21	the Complaint from the current deadline of July 29, 2022, for 30 days, up to and including August 29,	
22	2022.	
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25	///	
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28 LITTLER MENDELSON, P.C. 3960 Howard Hughes Parkway Suite 300 Las Vegas, NV 19169.5937 702.862.8800		

1	The requested extension is necessary in light of the fact that Defendant's counsel was just		
2	recently retained. The additional time will allow defense counsel to conduct a complete investigation		
3	into the allegations and to prepare a response to the Complaint.		
4	This is the first request for an extension of time to respond to the Complaint. This request is		
5	made in good faith and not for the purpose of delay.		
6	Dated: July 21, 2022	Dated: July 21, 2022	
7			
8	//		
9	/s/ Martina B. Sherman, Esq. JULIE A. MERSCH, ESQ.	/s/ Amy L. Thompson, Esq. AMY L. THOMPSON, ESQ.	
10	LAW OFFICES OF JULIE A. MERSCH	LITTLER MENDELSON	
11	MARTINA B. SHERMAN, ESQ.	Attorney for Defendant HARTFORD LIFE AND ACCIDENT	
12	DEBOFSKY LAW, LTD.	INSURANCE COMPANY	
13	Attorneys for Plaintiff		
14	VIRGINA ROLLINS		
15		IT IS SO ORDERED.	
16	Dated:		
17		Dated:	
18		.1	
19	UNITED STATES MAGISTRATE JUDGE		
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22	4883-4280-9642.1 / 059196-1000		
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SON, P.C.		_	

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